**Department of the Army**
**Headquarters, United States Army**
**Training and Doctrine Command**
**Fort Monroe, Virginia 23651-1047**

**TRADOC Regulation 700-8**

7 July 2000

Logistics

# ESTABLISHING HAZARDOUS MATERIAL MANAGEMENT PROGRAMS ON TRADOC INSTALLATIONS

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**Summary.** This regulation prescribes establishing Hazardous Material Management Programs (HMMP) on TRADOC installations.

**Applicability.** This regulation applies to all TRADOC installations.

**Supplementation.** Supplementation is authorized. Send one copy of the supplement to Commander, TRADOC, ATTN: ATBO-HS, 5 North Gate Road, Fort Monroe, VA 23651-1048.

**Suggested improvements.** The proponent of this regulation is the Deputy Chief of Staff for Base Operations Support (DCSBOS). Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) through channels to Commander, TRADOC, ATTN: ATBO-HS, 5 North Gate Road, Fort Monroe, VA 23651-1048. Suggested improvements may also be submitted using DA Form 1045 (Army Ideas for Excellence Program (AIEP) Proposal).

**Availability.** This publication is only available on the TRADOC Homepage at http://www-tradoc.army.mil.

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# Chapter I
# Introduction

**l-1. Purpose.** The purpose of this regulation is to provide TRADOC guidance on establishing Hazardous Material Management Programs (HMMP) and establishing and operating hazardous material (HAZMAT) centers on TRADOC installations when they are determined necessary to implement HMMP. It does not serve as a mechanism for requesting additional personnel or resource allocations.

**1-2. References.** Appendix A contains the required and related publications.

**1-3. Explanation of abbreviations.** The glossary contains abbreviations used in this regulation.

# Chapter 2
# Responsibilities

**2-1. General.** This chapter assigns responsibilities for TRADOC headquarters and installation agencies regarding the HMMP.

**2-2. Commanding General, TRADOC.** Provide guidance and policy necessary to implement this program.

**2-3. Deputy Chiefs of Staff for Combat Developments, Doctrine, Information Management, Intelligence, Resource Management, and Training.**

a. Identify personnel to serve as TRADOC Process Action Team (PAT) members.

b. Provide guidance and assistance from your area of expertise as necessary.

c. Determine how to best include enhanced awareness of hazardous material management in your areas of responsibility.

**2-4. Deputy Chief of Staff for Base Operations Support.**

a. Provide TRADOC staff oversight of the program.

b. Provide the TRADOC lead for the program.

c. Establish and chair the TRADOC PAT.

d. Provide supply/logistics, fire and environmental expertise necessary for program implementation.

e. Develop and coordinate program policy and guidance.

f. Develop a TRADOC HMMP/Hazardous Substance Management System (HSMS) implementation strategy.

g. Review installation implementation plans for approval.

h. Identify personnel to become familiar with the modules of the HSMS to be able to work with installations on the system.

i. Coordinate with installation activities on all aspects of this program.

**2-5. TRADOC Hazardous Material Management Program (HMMP) PAT.**

a. Establish policies and procedures for developing installation hazardous material management programs.

b. Resolve issues on resourcing and surcharges.

c. Determine new training requirements for educating personnel on hazardous material management procedures.

d. Identify and obtain legal opinion on HMMP issues.

e. Assist in fielding the HSMS for tracking hazardous materials.

**2-6. Installation commanders.**

a. Develop and institute HMMP in accordance with (IAW) TRADOC guidance.

b. Identify an installation point of contact (POC) to be in charge of developing the installation program and to coordinate with the TRADOC POC.

c. Assign responsibility for inspections at installation level.

d. Ensure installation contracts contain necessary language to effect control of hazardous material used by contractors on the installation.

e. Ensure programs:

(1) Incorporate surveying the installation and collecting all surplus hazardous material for possible reuse or disposal IAW appropriate laws and regulations.

(2) Assign responsibility for collecting and reporting data.

(3) Incorporate Emergency Planning and Community Right-to-Know Act (EPCRA) and State reporting criteria, as well as industrial hygiene concerns, to determine specifically which hazardous materials to track and report. Not all materials categorized as hazardous need to be tracked and reported. Examples of items that do not need to be tracked include "any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public" (ref 40 Code of Federal Regulations (CFR) 370.2).

(4) Incorporate guidance to require unit reporting to HMMP of local purchases to ensure that data be captured for government purchase cards used to acquire hazardous material.

(5) Provide for tracking hazardous material throughout its life cycle on the installation (i.e., requisition, receipt, storage, issue, use, and waste disposal).

# Chapter 3
# Establishing Hazardous Material Management Programs (HMMP) and Hazardous Material Control Centers

**3-1. General.** The Army's environmental strategy includes minimizing the use and disposal of hazardous substances. AR 200-1, para 5-2, outlines Army goals for hazardous waste reduction by the end of CY 1999, as a direct result of HMMP. AR 710-2 establishes Army hazardous material management policy, which requires commanders to implement programs to reduce and control hazardous material. Both the environmental strategy and logistical policy result from environmental regulation and Executive Order requiring tracking and annually reporting, in specific detail, hazardous materials acquired and used on Department of Defense (DOD) facilities.

**3-2. Intent.** The intent of this program is to minimize hazardous materials on TRADOC installations by:

a. Reducing hazardous material acquisition through product substitution and consuming 100 percent of the surplus or residual material on the installation.

b. Avoiding stocking material except for that actually needed for mission support. Generally, a 7- to 15-day supply of material on hand at the user level should be sufficient. Local purchase items are not to be stocked at the installation level.

**3-3. Concept.**

a. Commanders will institute HMMP IAW AR 710-2 that provides for the management and control of hazardous substances. Key to the success of these programs is that one organization be put in charge and the programs be developed by an installation working group, generally consisting of the Directorate of Logistics, Director of Public Works, Post Safety, Fire Department, Industrial Hygiene, Information Management, Resource Management, and Environmental Offices. The working group may also include major users/consumers of hazardous materials.

b. Installation programs may include establishing a central operating facility, an electronic or "virtual" center that links pertinent users to a central database management program, or a "distributed" center that incorporates the electronic linkage combined with reuse material maintained by the units/customers. Should hazardous material centers be established, they are to be operated as an extension of current installation supply operations to centrally receive, store, and issue hazardous substances to facilitate centralized management and tracking. Centralized management does not require segregated, centralized operations.

c. Entering into a joint venture with another installation or service on a regional basis is acceptable, particularly with respect to surplus reusable material that may be made available to the installation. The concept for operation should focus on minimizing the hazardous material stocked on the installation rather than creating another centralized stock storage point. Interservice support agreements (ISA) should specifically address services provided for which reimbursement is expected.

d. Where a hazardous substance tracking system is needed, all centers will use the DOD-approved Hazardous Substance Management System (HSMS) as the central database tracking system to track the life cycle of hazardous material (requisition, receipt, storage, issue, use, and disposal). Approval to use tracking systems already in place may be granted on an exception basis. Submit requests to Commander, TRADOC, ATTN: ATBO-HS, 5 North Gate Road, Fort Monroe, VA 23651-1048.

**3-4. Supply management procedures.**

a. The HSMS is not a requisitioning or asset accountability tool. Its purpose is to facilitate tracking the requisition, storage, use, and disposal of hazardous materials.

b. Units/installations will review their lists of hazardous materials used and, where possible, identify non-hazardous or less hazardous substances for use.

c. The Standard Army Retail Supply System (SARSS) will provide asset visibility and accountability for authorized stockage list (ASL) items. Local purchase and purchase card (International Merchant Purchase Authorization Card (IMPAC)) items are not authorized for ASL stockage.

d. Excess ASL material recovered from units, still in original packed, unit-of-issue quantities, will be picked up on the ASL. Units turning the items in will be provided 100 percent credit for the turn-in if the net asset posture is within the retention limit.

e. The inventory management tool of HSMS will be used to account for recovered material consisting of non-demand supported local purchase or purchase card (IMPAC) items, or residual ASL hazardous material in less than unit-of-issue quantities. These stocks will not be part of the Army Working Capital Fund (AWCF). HSMS tracking of turn-in and reissue of these Operations Maintenance, Army (OMA)-funded stocks provides adequate control until users consume them. Local purchase and purchase card (IMPAC) items will not be purchased and maintained in inventory in anticipation of demand.

f. Both AWCF and OMA-owned residual material may be stored in the same facility but in a separate location. SARSS will record the location of the stock funded material and provide for accountability while HSMS tracks the material as hazardous material in storage. AWCF and OMA-owned assets must be segregated and not commingled.

**3-5. Measures of performance.**

a. See AR 710-2, paragraphs 1-30 and 1-31, for supply support activity and unit level performance criteria.

b. Program management should provide for reducing installation hazardous material acquisition by 15 percent (or better) annually, pursuant to reducing acquisitions by 50 percent by 2003; FY 99 will be used as a baseline, or whenever your program is initiated subsequent to FY 99.

c. Additionally, installations should track the following data to evaluate the success of their program:

(1) Dollar value of reissue/reuse material issued.

(2) Dollar value hazardous material purchased (do not include reuse).

(3) Number of lines of hazardous material reduced (from baseline).

(4) Dollar value of hazardous waste disposal costs.

d. Installations should look to reduce hazardous materials purchased, reduce the number of lines of hazardous materials maintained in inventory, and reduce the amount of hazardous wastes resulting from hazardous material acquisition/use.

**3-6. Waivers.** Waivers may be granted for installations using a previously fielded tracking system or participating in a joint-service venture that differs from this policy. Waivers should be submitted to HQ TRADOC, ATTN: ATBO-HS, with justification. Waivers will not be granted for installations to acquire a new tracking system in lieu of (ILO) HSMS or to use HSMS as a supply management/accountability tool ILO SARSS. There is no sustainment funding for other than the DOD/DA approved system, HSMS.

# Appendix A
# References

**Section I**
**Required Publications**

AR 200-1
Environmental Protection and Enhancement

AR 710-2
Inventory Management Supply Policy Below the
Wholesale Level

**Section II**
**Related Publications**

Executive Order 13148, *Greening the Government Through
Leadership in Environmental Management*, dated April
22, 2000 (This Executive Order may be viewed at http://
www.denix.osd.mil/denix/Public/Legislation/EO/
note72.html)

40 CFR 370.2

Hazardous Substance Management System (HSMS)
System Technical Architecture Guide (STAG), Version
2.4, dated 1 Oct 1999 (This publication is available from
the HSMS Customer Assistance Office at
HSMS@saic.haisec.army.mil.).

**Section III**
**Referenced Forms**

DA Form 1045
Army Ideas for Excellence Program (AIEP) Proposal

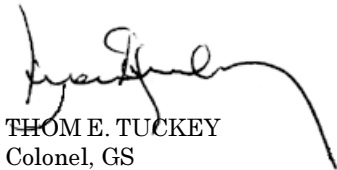DA Form 2028
Recommended Changes to Publications and Blank Forms

# Glossary

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| ASL | authorized stockage list |
| AWC | FArmy Working Capital Fund |
| CFR | Code of Federal Regulations |
| CY | calendar year |
| DA | Department of the Army |
| EPCRA | Emergency Planning and Community Right-to-Know Act |
| HAZMAT | hazardous material |
| HMMP | Hazardous Material Management Program(s) |
| HQDA | Headquarters, Department of the Army |
| HSMS | Hazardous Substance Management System |
| IAW | in accordance with |
| ILO | in lieu of |
| IMPAC | International Merchant Purchase Authorization Card |
| ISA | interservice support agreement |
| NSN | national stock number |
| OMA | Operations Maintenance, Army |
| PAT | Process Action Team |
| SARSS | Standard Army Retail Supply System |
| TRADOC | Training and Doctrine Command |

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